IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI SOUTHERN DIVISION

TRADING PLACES)
INTERNATIONAL, LLC,)
)
Plaintiff;)
)
vs.) Case No. 6:15-cv-03092-BI
SUMMERWINDS RESORT)) Unopposed
SERVICES, LLC, et al.,)
)
Defendants.)

MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

TPI Respectfully requests leave of this Court, under Rule 15(a)(2), to file its proposed *First Amended Complaint* (**Exhibit A**) to resolve the parties' dispute regarding the pleading of jurisdictional facts, and to otherwise clarify TPI's allegations.

At the parties' Rule 26(f) conference, counsel for defendants orally agreed to withdraw their pending motions to dismiss (Docs. 7 & 8) upon the filing of TPI's *First Amended Complaint*. A draft of **Exhibit A** was submitted to counsel for defendants for review and comment on July 13, 2015 (*see* Email attached as **Exhibit B**), but no objections or other responses have been received.

Respectfully Submitted,

LATHROP & GAGE LLP

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a complete copy of the foregoing was electronically filed this 21st day of July, 2015, using the Court's CM/ECF system, which will provide notice to the following:

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/s/ James E. Meadows
Attorney of Record